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**Houston/Harris County Continuum of Care
Rapid Re-housing Business Rules**

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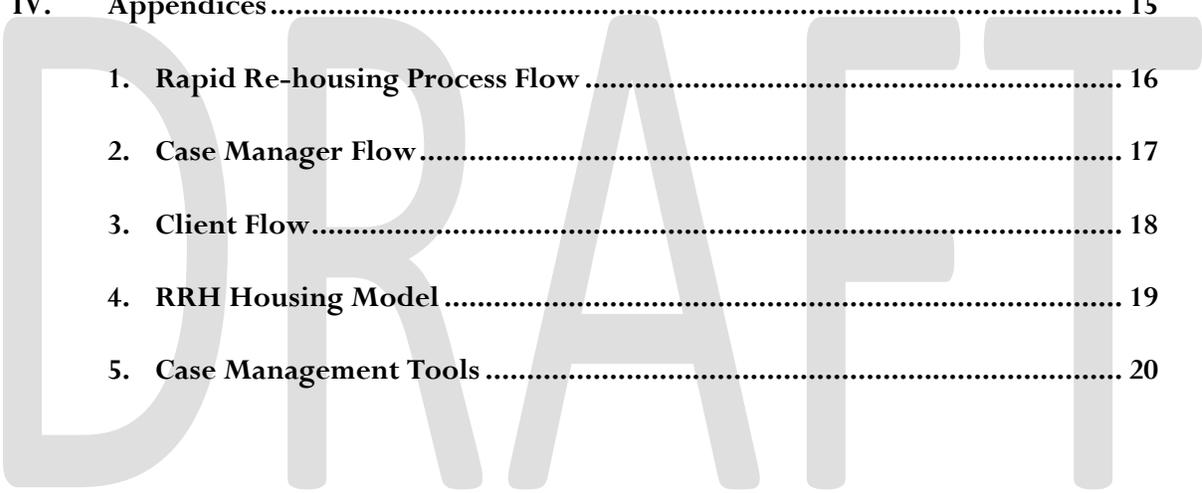
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I. Introduction

Following the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, the Houston/Harris County Continuum of Care began to coordinate service delivery across the continuum. This began with Continuum wide standards for the provision of Emergency Solutions Grants funding, initially supported by public funders within the CoC in 2011. Since implementing Continuum-wide standards, entitlement communities that are members of the Houston/Harris County Continuum of Care have met regularly to solidify coordination across the continuum with both the CoC lead agency and among entitlement communities to ensure the most effective and efficient use of funding to end homelessness.

As part of this coordination, Continuum participants are assembling resources to create a standard Rapid Re-housing Model of funding for the continuum. This funding model aims to increase the reach of rapid re-housing funds to provide assistance to the most families possible in the Continuum, allow for efficiency in providing services and standardized service delivery among providers.

The rules set forth in this document outline the process and responsibilities for funders, service providers and intermediaries in the implementation and ongoing work around this strategy for providing assistance. The model for the Houston/Harris County CoC was developed collaboratively using data to support decision making. Outcomes and ongoing data monitoring will support the continued growth of the strategy as well as inform stakeholders of opportunities for improvement. The strategy is in line with The Way Home, the community plan to end homelessness; *Opening Doors*, the Federal Plan to End Homelessness; and the policies of the CoC Steering Committee.

II. Definitions

Area Median Income (AMI) – Annual income estimates published by the U.S. Department of Housing and Urban Development (HUD) published annually and based on Fair Market Rent (FMR) Areas. For the Houston/Harris County Continuum of Care, the HUD FMR Area is Houston-Baytown-Sugarland. AMI and Median Family Income (MFI) are used interchangeably to determine the income limits for a household eligible for assistance.

Auto exit – Auto exit refers to an electronic automatic exit of a household from rapid re-housing assistance through the homeless management information system (HMIS). Auto exit will only occur if a household is referred for a case management appointment through coordinated access and does not meet with a case manager within the seven day time frame. On the eighth day, HMIS will auto exit the household and associated funding from available assistance. Auto exit does not preclude a household from receiving future assistance. A household that is scheduled to receive assistance and appears for that appointment or contacts the case manager beyond the seven day window will be assisted by the originally assigned case manager in re-entering the system through coordinated access. However, any funds associated with that household will be released and the household may be placed on a wait list based on funding availability.

Continuum of Care – the local planning body responsible for coordinating the full range of homelessness services in a geographic area. The local Continuum of Care (CoC), identified by HUD as the Houston/Harris County Continuum of Care, covers the geographic area of Houston, Harris County and Fort Bend County and is governed by the CoC Steering Committee.

CoC Steering Committee – the governance and decision making body for the Houston/Harris County CoC. The Steering Committee includes representatives from across the continuum representing community representing the public and private sector and includes consumer representatives.

Coordinated Access – designed to meet the requirements for coordinated assessment as outlined by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. The Houston/Harris County CoC has created a Coordinate Access System that institutes a consistent and uniform assessment and referral processes to determine and secure the most appropriate response to each individual or family's immediate and long-term housing needs. Coordinated Access, Coordinated Placement and Coordinate Access System are used interchangeably throughout this document.

Desk Monitoring – the process of reviewing and tracking program data toward outcomes remotely using a data reporting system. The Houston/Harris County CoC uses the HMIS to perform desk monitoring, which is used to track individual progress toward system outcomes and identify opportunities for technical assistance to ensure program compliance and progress.

Disabling Condition - HUD defines a disabling condition as: (1) A disability as defined in Section 223 of the Social Security Act; (2) a physical, mental, or emotional impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impedes an individual's ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions; (3) a developmental disability as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act; (4) the disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome; or (5) a diagnosable substance abuse disorder.

Exit – when an individual or household is removed from service via HMIS because of program completion, transition, termination or relinquishment. In some cases, a household may have multiple exits from the program if they are auto-exited due to program time limitations (see Auto-exit definition). Exits can be permanent or temporary. An exit is identified as the last month, day and year of service to a household and may or may not be tied to rental assistance. For non-residential projects the exit date may represent the last day a service was provided or the last date of a period of ongoing service. The exit date should coincide with the date the client is no longer considered a project participant.

Fair Market Rent (FMR) – determined by HUD annually as the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market. Annual listings of FMR can be found at <http://www.huduser.org/portal/datasets/fmr.html>

Financial Assistance – encompasses all forms of financial assistance available for rapid rehousing including financial assistance for housing relocation and stabilization as well as short- and medium-term rental assistance

Housing Stabilization and Relocation – may include rental application fees, security deposits, last month's rent, utility deposits, utility payments and moving costs. All must be in accordance with 24 CFR 576.105 (a) 1-6.

Rental Assistance – short-term (up to 3 months) or medium term (3 – 24 months) of rental assistance, including arrears toward housing over a three year period. Provision of rental assistance to participants must be in accordance with 24 CFR 576.106. Local restrictions and targeting of rental assistance are outlined in the Standards for the Provision of Rapid Re-Housing adopted by the Houston/Harris County Continuum of Care.

HEARTH Act - The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, which consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revises the Emergency Shelter Grants program and renames it as the Emergency Solutions Grants (ESG) program. The HEARTH Act also codifies into law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs.

Homeless Management Information System (HMIS) – the information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

Hold – the electronic reserve of a place and funding placed on rapid re-housing assistance through the coordinated access system. A hold indicates a spot for a household to receive housing relocation and stabilization services through a case management vendor as well as holds a pre-determined amount of funds for rental assistance for that household.

Homeless – as defined by HUD for the purposes of rapid re-housing, only those households that fall under the HUD definition of:

Category 1: Literally Homeless includes an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 4: Fleeing or attempting to flee domestic violence includes any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

Household – an individual or family receiving rapid re-housing assistance. A household can be one person or more. Families may include parents and children, non related adult households, combined households of non-related adults and children or other make-up of related and non-related adults and children.

Housing First – a philosophy of providing housing to homeless individuals that focuses on providing services to individuals once they are in housing to assure housing stability and does not require sobriety, medication compliance or agreement to participate in specific services as a condition of receiving assistance.

Housing Stability case management – case management provided to households receiving rapid re-housing assistance which may or may not be linked to short- or medium- term rental assistance and other financial assistance. Housing stability case management focuses on addressing the immediate need for housing, stabilizing families and individuals in housing and connecting households to mainstream resources to ensure long term housing sustainability.

Housing Search and Placement – assistance to specifically identify and place households in appropriate, affordable housing for households receiving rapid re-housing assistance. This includes connecting households with properties that have low barriers to accessing housing, negotiating fees, facilitating move in dates and identifying appropriate areas for housing based on household wants and needs.

Participant share – the amount of monthly contribution a household enrolled in rapid re-housing must contribute to rent.

Permanent Supportive Housing – deeply affordable housing with comprehensive services that are voluntary and tenant-centered.

Permanent Housing – housing that does not have occupancy limits. This can include market rental housing, subsidized housing, supportive housing and other types of housing where individual tenants hold a lease.

Rapid Re-Housing – flexible assistance designed to help homeless individuals and families move as quickly as possible from homelessness to permanent housing and achieve stability through rental assistance supportive services. Rapid Re-housing services should be provided in an environment that has low barriers to entry and supports a Housing First model.

Rent Reasonableness – the process of determining the practicality of a proposed rent amount for a unit. This is done both formally, through market analysis of a determining agency, as well as informally through a case manager or housing specialist ahead of submitting for a rent payment request comparing available data of surrounding units.

Selection Committee – the group of public funders who review and select the Financial Assistance Intermediary and Case Management Intermediary based on common evaluation criteria.

III. Policies and Procedures

1. Roles and Responsibilities

Funders

Funding for the Houston/Harris County Continuum of Care Rapid Re-Housing Model is collaborative and collective. Funders will align resources to increase efficiency, extend the reach of funds and stabilize as many households within the continuum as possible. This model connects public and private funds across the continuum, which covers two counties, dozens of cities and four U. S. Department of Housing and Urban Development (HUD) entitlement communities which receive Emergency Solutions Grants (ESG). The funding partners will select and monitor two intermediaries to manage the program: one for fiscal management and oversight and one for case management monitoring and oversight. Selection of these entities is based on collaborative decision making that identifies a single organization for each role. Members of the funding collaborative will create a request for proposals for both entities and select the agencies based on shared evaluation around the organizations best positioned to assume this role. The agencies will distribute a common proposal for each intermediary and use common evaluation tools to select each intermediary. The funders are also responsible for creating the common monitoring and evaluation tools that will be used to evaluate each intermediary's outcomes related to implementation, launch and maintenance of the rapid re-housing model. This collaborative is made up of public funders which includes Federal, State and Local funds and private philanthropic and corporate funding partners. The role of each is described below.

- A. Public Funders** – The public funders are responsible for driving the overall process for Rapid Re-Housing in the Houston/Harris County Continuum of Care and ensuring that goals for funding are in compliance with all regulations set forth by HUD and the HEARTH Act, as well as any local policies and other federal requirements put in place through the annual Notice of Funding Availability (NOFA) for the CoC funding competition, Emergency Solutions Grants Funds and Community Development Block Grants as applicable. Public funds include Federal, State and Local funding allocations through HUD as well as any additional state or local funds that may be dedicated to the initiative.
- i. Federal:** Funds available to the community directly through the Annual HUD Continuum of Care grant funding competition. Funds available for rapid re-housing are restricted based on federal priority groups and adjusted annually based on the annual NOFA for CoC funds. All CoC funding dollars are managed through the Coalition for the Homeless, the local CoC lead agency, with oversight of use by the CoC Steering Committee.
 - ii. State:** State funds for rapid re-housing include the Homeless Housing and Services Program (HHSP) that are directed to the community through the City of Houston. Other State funds may include Texas Department of Housing and Community Affairs (TDHCA) Emergency Solutions Funds (ESG) as part of the Continuum of Care or sought through the case management intermediary or other appropriate funds as they become available.
 - iii. Local:** Local funders include Houston, Harris County, Fort Bend County and Pasadena who receive ESG funding as entitlement communities from HUD. Public funders may also include other communities within the Continuum of Care who receive entitlement funding from HUD but do not receive direct ESG funds such as Sugarland, Baytown and Missouri City. Local public funds dedicated to Rapid Re-Housing include both ESG and CDBG funding and may also include HOME funds where available. Local funds could also include other public

resources available to serve homeless individuals such as local bonds, taxes or general revenue funds.

B. Private Funders - Private funders include any local or national private philanthropic, corporate foundations and other funding institutions that agree to participate in the rapid re-housing funding collaborative. Private funders will provide flexible support to the intermediaries selected through Request for Proposal process. Private funding may be allocated directly to the intermediaries or as part of a larger funding pool through a proposal process managed by the CoC lead agency. Private funding will be used to expand and support all aspects of the rapid re-housing model but will be most targeted to the expansion of case management to allow for flexible, regionally focused case management without the limits of jurisdictional boundaries that exist with public funds. Private dollars will also support expansion of financial assistance to allow for a flexible pool of funds that can fill gaps for housing stabilization services not funded through public dollars such as emergency household or medical needs.

Subrecipients

The Rapid Re-Housing funders' collaborative anticipates two intermediaries that will serve as subrecipients for public and private funding. These intermediaries, described below, will be responsible for managing and distributing the public and private contributions of the rapid re-housing funding collaborative.

A. Financial Assistance Intermediary - The Financial Assistance Intermediary will be responsible for the management, distribution and reporting for all financial assistance available through the rapid re-housing collaborative. Further description of the Financial Assistance Intermediary responsibilities are included below.

- i.** The Financial Assistance Intermediary (FAI) will manage multiple funding sources and track funding availability by source and type. Any agency that serves as the FAI must have a data management system with the capacity to classify funds by individual funder and distribute funds based on subrecipient need. The FAI will also be responsible for tracking total funds available for assistance across the collaborative and communicating this to the CoC lead agency and CMI via monthly update meetings. . The FAI will also be responsible for maintaining a reserve of funding that ensures available resources to any household that enters into the homeless services system.
- ii.** The FAI will be responsible for regular reporting to individual funding sources based on distinct requirements. These may include reports required for and by HMIS, IDIS, eSNAPS and other funding systems. This may also include reports to individual funders as required by governing boards and councils for each funding source.
- iii.** The FAI will have the capacity to staff the rapid re-housing program with skills that can support the information technology infrastructure, conduct rent reasonableness and housing quality standards inspections, interface with landlords and process payments, maintain effective communication with the case management intermediary and its subrecipients, maintain effective communication with CoC lead agency through coordinated access, conduct and maintain quality data entry and oversee the reporting and monitoring process for the FAI. Staffing can be through the FAI or through subcontracts with other qualified agencies that meet the fiscal and reporting responsibilities described herein.
- iv.** The FAI will be responsible for creating a monitoring plan for any subcontractors. Subcontractors may include an additional fiscal intermediary to provide specialized financial assistance or an organization with expertise conducting inspections and/or rent

reasonableness. Monitoring will ensure any work performed conforms with all regulatory requirements and requirements of the funding collaborative.

B. Case Management Intermediary – Case Management Intermediary will be responsible for oversight and management of the case management component of the rapid re-housing funding collaborative. This will include monitoring subcontractors to ensure compliance with regulations, the repaid re-housing program model and progress toward continuum-wide outcomes. Specific responsibilities are outlined below.

- i.** The CMI will be responsible for managing and distributing multiple funding sources for case management, ensuring distribution among geographically appropriate service providers and providing logistical support to the system. Any CMI will be contracted based on
 - performance and outcomes of all subcontractors toward the continuum-wide outcome measures as described in the CoC Steering Committee approved Housing Model for Rapid Re-Housing; and
 - experience and capacity to procure and manage service agencies that will provide case management; and
 - ability to validate financial systems for the subcontracts.
- ii.** The CMI is not expected to provide direct services, but instead will subcontract with qualified service providers in the community to deliver quality housing stabilization case management and housing navigation expertise. The expectations of services include:
 - case managers that are geographically distributed to meet the needs of households receiving rapid re-housing services. Any case manager will be credentialed to effectively provide housing stabilization case management as defined within these rules and outlined within the RFP for case management providers. Case managers should also have the ability to provide and support housing navigation services as needed and;
 - housing navigators/specialists that are responsible for building and maintaining relationships with landlords to ensure rapid placement in quality affordable housing and reduce the barriers to housing. This will include minimizing the fees associated with housing placement such as application and deposit fees. Housing navigators will work with any referred household to provide housing search and placement per the need of the household. The specialist will also assist households in completion of required documentation and ensure that units are reasonable based on FMR, area and amenities so that households can secure units as quickly as possible.
- iii.** The CMI will be responsible for regular reporting to individual funding sources based on their distinct requirements. These may include reports required for and by HMIS, IDIS, eSNAPS, other funding systems and/or funding source reporting forms. The CMI will provide monthly reports to funders based on desk monitoring that includes demographic data of households served, total assistance provided and tracking based on use of common assessment tools and adherence to housing stabilization plan. The CMI will use the analysis to support adjustments to funding hold amounts in conjunction with the FAI and Coordinated Access. The CMI will have policies and procedures in place for maintaining confidentiality of all households who are homeless as a result of fleeing domestic violence as outlined in 24 CFR 576.500 (x).
- iv.** The CMI will have solid project management experience and dedicated staff to manage the rapid re-housing program. CMI staff must also have appropriate training or educational background that enables the organization to effectively evaluate the outcomes of any subcontractor. Staff from the CMI will be expected to participate in any Continuum-wide

training required for case management staff as well as be a registered user with the Homeless Management Information System (HMIS).

- v. The CMI will be responsible for creating a monitoring plan for case management subcontractors that measures each agency's progress toward continuum-wide outcomes. Monitoring will include ensuring client eligibility and homelessness documentation based on regulatory and programmatic requirements as well as ensuring consistency across the case management subrecipients in distribution of funding. It is expected that the CMI will also review the HMIS for use, data quality and accuracy based on the HMIS data quality standards

CoC lead agency

The Coalition for the Homeless, as the CoC lead agency, will serve multiple roles in the oversight and performance of the rapid re-housing program. The CoC lead agency will be responsible for reporting to the CoC Steering Committee on dashboards and outcomes related to rapid re-housing. In this role, the Coalition will ensure that all components of the service delivery for rapid re-housing are aligned with the CoC goals and strategies for ending homelessness. The CoC lead agency will do this through dedicated project management to the rapid re-housing program as well as regular CoC lead agency duties as outlined below.

- A. Management of HMIS and data quality will be through the CoC lead agency. This includes day to day data quality requirements but may also include technical assistance to the FAI, CMI or subcontractor entities around data entry, quality and reporting.
- B. The CoC lead agency will be responsible for tracking and reporting overall outcomes for the rapid re-housing program to the CoC Steering Committee, to rapid re-housing funders collaborative and to the public through dashboards. Outcomes will be based on both data quality standards and CoC approved goals as outlined in the rapid re-housing housing model and approved by the CoC Steering Committee.
- C. The CoC will also be responsible for regular reporting to public funders as required by each funding program which includes but is not limited to the Consolidated Annual Performance and Evaluation Report (CAPER) required for each entitlement community, Annual Performance Reports (APR) as required by HUD and any other additional reports required by federal, state and local funders that will be tracked and managed through HMIS. In its reporting role, the CoC lead agency will also be responsible for notifying the CoC Steering Committee and rapid re-housing funders of any issues or trends identified through regular analysis with the FAI and CMI that may trigger a change to the rapid re-housing program model. In addition, the CoC lead agency will provide pertinent data for reporting requirements outlined by funding sources, such as those of the Annual Action Plan, Consolidated Plan or foundation and corporate Boards of Directors and/or oversight Boards.

Rapid Re-housing provider workgroup

The Rapid Re-housing provider workgroup is the CoC affinity group of providers that provide strategic support to the development of continuum-wide tools adopted by the rapid re-housing funders collaborative. The RRH provider workgroup will continue to provide feedback to the CoC Steering Committee in its role as affinity group and recommend to the CoC Steering Committee any changes that may be necessary to the rapid re-housing program tools or strategies based on best practices in implementation.

2. Rapid Re-housing process and Design

Funding/Vendor Selection

- A.** Overview - The rapid re-housing funders collaborative has created a new process and design for management, distribution and performance around rapid re-housing for the Houston/Harris County Continuum of Care. By formalizing the process and distribution of funds among all public funders, the rapid re-housing funders collaborative ensures that homeless individuals seeking assistance will be able to receive the same quality and level of assistance across the continuum. This also ensures the most efficient use of funding and resources that will allow the collaborative to reach households within our community with the highest need. The elements below describe the process and design for how rapid re-housing funds will be distributed and the case management driven program will operate. The program is designed to ensure housing stability for homeless households in need of short to medium term assistance using a housing first model for services.
- B.** The Collaborative will align its resources to create greater impact and leverage more dollars for assistance. Participation in the aligned funding model satisfies the required Continuum-wide coordination and collaboration as outlined in the HEARTH Act. Public and private funders will agree to align funding and will have common goals and expectations around vendor selection, capacity and overall project management for the rapid re-housing program.
- C.** Members of the collaborative will select vendors for the two fiscal intermediaries (financial assistance and case management) through a competitive Request for Proposals process. The intermediaries will be procured and approved by a selection committee of ESG funded entitlement communities and the CoC lead agency with the Houston/Harris County CoC. Funders may also agree to contribute funding to vendors after selection is made through the initial RFP process. Intermediary organizations will be selected based on criteria outlined in these rules and the RFP. There will be an option for contract renewal based on performance toward Continuum wide outcomes and overall contract performance.
- D.** Case management vendors will be selected on their ability to adhere to the continuum wide outcomes and meet the expectations of the funding collaborative as outlined in these business rules and RFP. Vendors must also ensure compliance with the written standards for rapid re-housing assistance.
- E.** Overall project management for the rapid re-housing funding collaborative will be through the Coalition for the Homeless of Houston/Harris County, the CoC lead agency for the collaborative. A dedicated staff person will be assigned to the collaborative to ensure the collaborative is on track to achieving its goals as outlined. The project manager will also serve as the point person for the collaborative and manage any communication or process concerns identified by the funders, intermediaries, coordinated access or vendors and will be responsive to trouble shooting for the collaborative.

Service Delivery

Service delivery for the rapid re-housing model is standardized and uniform across the continuum. All eligibility, referral and assessment will be done through a continuum-wide, standardized process and use standardized tools that ensure the same level and quality of service regardless of vendor agency. The process described below outlines the way vendors will provide rapid re-housing assistance to homeless households from entrance and eligibility through housing placement, program exit and follow up.

- A.** The continuum-wide coordinated access and placement system will be the sole source of placement into rapid re-housing for the Houston/Harris County Continuum of Care. Households

will access the homeless services system through one of the coordinated assessment hub sites or through a case manager supported assessment to the call-in center.

- B.** Eligibility for rapid re-housing is determined by a specialized, trained assessor dedicated to coordinate access. This assessor will use the guidance established in the ESG standards for the provision of rapid re-housing to ensure eligibility for assistance based on regulatory requirements including income, housing status and household composition.
- C.** Referral for rapid re-housing assistance is done only through a trained assessor within the coordinated assessment system and will be made electronically through HMIS. Any agency providing rapid re-housing assistance must accept referrals through coordinated assessment and the front door into the rapid re-housing program is only through coordinated assessment. When coordinated access makes a referral of an eligible household to a rapid re-housing service provider both the CMI and FAI will be notified electronically.
- D.** The FAI will set aside funds for each referred household. The amount placed on hold will be based on national averages and will be updated through coordination of the FAI, CMI and the CoC lead agency to reflect the local data and outcomes. Coordinated Access and the FAI will have a user agreement in place with the HMIS that outlines the roles and responsibilities of communication and data sharing to ensure this process is fluid. The CMI, FAI and Coordinated Access will meet after the first quarter of funding to identify if the average for each household should be adjusted. Thereafter, the three entities will meet monthly to review the amount represented by each household and update accordingly.
- E.** Once an individual is found eligible for rapid re-housing, the assessor will provide a direct referral to a case manager vendor. Available slots for rapid re-housing in HMIS will be based on an average caseload of 35 families. Each case manager will accept households until they reach 35 units. If all case management vendors are at capacity with case load, the coordinated access system will place the household on a waitlist managed through the coordinated assessment system. Referrals for rapid re-housing are made as funding is available and are made directly to the case management vendors based on availability in HMIS. Coordinated Access will assign referrals based on geographic area to the best of their ability. CA may refer households interested in a specific geography to a case management vendor located in an area that is outside of their preferred service area. If a case management vendor is unable to accept a referral, the vendor must initiate a case call between coordinated access, the CMI and the vendor to identify the reason a household is not an appropriate fit for that vendor.
- F.** Once Coordinated Access directly refers a client to a case management vendor, a case manager will have an initial appointment with the household to conduct an overall housing assessment and develop a housing plan. This assessment and housing plan will be done using the standardized tools approved for all case managers in the Houston/Harris County CoC. These tools are included as reference in Appendix E. The time between referral and initial appointment cannot exceed 7 days or the household will be released from rapid re-housing. If a funding is released from the system prior to the initial appointment, it can only reenter the system through coordinated access. If a household shows up at the case management vendor after the 7 days have expired, the case manager will assist the household in reentering the system through coordinated access. Details of the release process are explained in the definition section of these business rules.
- G.** Upon completion of a housing plan with the participant household, the case manager will complete a Financial Assistance Request (FAR). Like the referral, this request will be done electronically through HMIS and communicated directly to the FAI and the CMI. The FAR will detail the FAI share and client share for rent and overall financial assistance request based upon the budgeting tools and housing plan. The FAR will indicate how the FAI should adjust the funding to

reflect the actual amount needed as well as adjust the total available pool as appropriate. Adjustments to the available financial assistance will be done by the FAI.

- H.** Once a housing plan is complete, the process for housing search and placement can begin. The case manager will refer directly to housing navigation staff as needed for any household requesting or requiring additional assistance. Housing navigation assistance will be available but not required for each household. Case managers will assist with housing navigation services for those households that do not need a dedicated housing navigator. Each agency providing case management will have dedicated housing navigators, either through the agency or shared among the collaborative as assigned by the CMI. Housing navigation specialists will also help secure utility and security deposits and application fees for households that require this additional assistance. Part of housing search and placement, either with the case manager or housing navigation staff, will include informal rent reasonableness to ensure a client is seeking housing that is reasonable for the area, but also for their projected income and needs.
- I.** The goal for the rapid re-housing program is that the total process, from eligibility referral to housing placement, within 30 days. Once housing is identified, the case manager or housing navigator will submit an Intent to Lease form (ILF) with the deposit request and an unexecuted lease to FAI. Submission of the ILF triggers an inspection and evaluation of rent reasonableness by the FAI or its contractor. Once a unit has passed inspection, the FAI will communicate with the case manager or housing navigation staff who submitted ILF that the unit is ready for leasing.
- J.** Once a unit passes inspection, the FAI will release a Lease and Rental Assistance Agreement (Agreement) between the FAI and the landlord. The Agreement will be based on the lease and housing plan. The case manager/housing navigator will work with the landlord to complete and review the lease and rental assistance agreement and return it into FAI. The Agreement and lease should be in place within 45 days of the FAR. A case management supervisor can review and extend for up to 90 days as needed for extenuating circumstances that include but are not limited to failed inspection, landlord delays, and unexpected medical or financial conditions. Any case that exceeds 90 days must conference with the case management supervisor for that vendor and the CMI to identify the reasons for ongoing extensions and the long term plan for housing stability. Case managers will work with households to expedite the search and placement process in the case that a unit is deemed unacceptable because of multiple failed inspections. Any unit that fails two inspections can only receive a third inspection if a written request is submitted to the FAI by the case manager or housing specialist detailing the reason for request. The process for funding release and request will be initiated with the rental assistance agreement and placed into the electronic check distribution system of the FAI. The FAI will process payments based on the rental assistance agreement. Case managers will submit any adjustments to the rental amount by the 15th of each month. The FAI will notify landlords of rent changes through a rent change notification submitted by the within 10 days of a processed budget adjustment and no later than the 28th of each month. Adjustments will be made through the same process as the rental assistance release. The FAI and CMI will establish a communication plan to meet required timelines and to notify the CMI and vendor of the appropriate funding source.
- K.** The CMI will ensure that each agency has a grievance procedure in place and appeals for termination for clients. The CMI will monitor the use of the grievance procedure for each case management vendor and have a process in place for clients that chose to appeal to the CMI. The funding collaborative will monitor the CMI to ensure consistency in use and application of grievances and terminations.

Terminations

Households may be exited or terminated from rapid re-housing assistance based on program requirements. The types of exits a case manager might enter into HMIS for reporting are detailed in the reporting section. This section describes when households might be auto-exited or assistance is terminated. All exits and termination will be documented in HMIS and supported by case notes.

- A.** Households will be auto-exited from rapid re-housing for reasons noted in these business rules that apply to timeliness and communication in establishing appointments, creating a housing plan and engaging in housing search and placement process.
- B.** Households will be auto-exited from rapid re-housing if they receive 24 months of assistance over a 3 year period, as required by HUD and outlined in 24 CFR 576.104.
- C.** Any household may be terminated from rapid re-housing assistance if deemed necessary by a case management vendor and monitored by the CMI. Reasons for termination may include but are not limited to:
 - i.** Incarceration or institutionalization over 90 days. Case managers in coordination with the FAI and CMI may continue to support households where the head of household receiving assistance is incarcerated or institutionalized for up to 90 days. Any household where the head of household receiving assistance is incarcerated or institutionalized for more than 90 days will be terminated from the program in accordance with 24 CFR 576.500 (b)(2).
 - ii.** Households will be terminated from assistance if the landlord cites the tenant for breaking the lease agreement between the tenant and landlord and supported by the Rental Assistance Agreement between the FAI and landlord.
 - iii.** Tenants who are not participating in their agreed upon housing plan may be terminated from assistance. This is only for tenants who are not actively participating in their assistance rather than noncompliance with any one aspect of their plan. Terminations for this reason should be rare, and participants should be linked to coordinated access for additional housing options where appropriate. Terminations must include documented incidences where a household is not participating in their agreed upon responsibilities of the housing plan or those cases where there is abandonment of the program and unit.
- D.** In the case of termination, the case management vendor will notify the CMI of termination by the next working day of client termination. The CMI must notify the FAI to immediately stop payment for the unit where a household has been terminated. In the case that the FAI is notified via the landlord, the FAI will notify both the CMI and appropriate vendor. All terminations must be in accordance with 24 CFR 576.402 and do not preclude a household from receiving future assistance.

Data Entry and Reporting

All entities that are contracted to provide services and case management will be responsible for entering data into HMIS. All reporting and data entry requirements for rapid re-housing will be dictated by the HMIS user agreement. Outcomes reporting will be pulled from data entered directly into HMIS. All case management vendors are expected to adhere to existing HMIS data quality standards and any updates to the standards published by HUD and/or adopted by the Continuum of Care. The CMI will monitor against the standards and is responsible for reviewing data for quality and accuracy. The CMI will generate quarterly reporting to funders through HMIS.

IV. Appendices

1. Rapid Re-Housing Process Flow
2. Rapid Re-Housing Case manager workflow
3. Rapid Re-Housing Client experience flow
4. Housing Model for Rapid Re-Housing
5. Case management tools
 - A. Rapid Re-Housing Placement Assessment
 - B. Rapid Re-Housing Plan
 - C. Rapid Re-Housing Plan Guide
 - D. Rapid Re-Housing Budget

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